



## The Telephone Connection of Los Angeles, Inc.

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February 6, 2006

### **VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: The Telephone Connection of Los Angeles, Inc.  
The Telephone Connection Service, LLC  
The Telephone Connection IXC Services, LLC  
Certification of CPNI Filing (February 6, 2006)  
EB Docket No. 06-36  
EB-06-TC-060

Dear Ms. Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006<sup>1</sup> and the Commission rules concerning telecommunications carriers protection of the privacy of customer proprietary network information ("CPNI"),<sup>2</sup> The Telephone Connection of Los Angeles, Inc., ("TCLA") The Telephone Connection Service, LLC ("TCS") and The Telephone Connection IXC Services, LLC ("IXC Services") (individually and collectively, the "Company") submit this Compliance Statement and Certificate. Both TCS and IXC Services are wholly-owned subsidiaries of TCLA and the undersigned is an officer of all three entities. Protecting CPNI is an important obligation for all telecommunications carriers and the Company has adopted various operational procedures to assure that all of the CPNI that it holds is protected from unauthorized and illegal use, access and disclosure.

As requested by the Public Notice, the undersigned, as an officer of the Company, certifies based upon personal knowledge that the following Compliance Statement describes the

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<sup>1</sup> *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").

<sup>2</sup> 47 C.F.R. § 64.2001, *et seq.*

operational procedures and policies implemented by the Company to ensure the privacy of its customers' CPNI consistent with the Commission's CPNI rules.

### **STATEMENT OF COMPLIANCE WITH CPNI RULES**

The Company has elected to utilize or provide CPNI only for purposes that are permissible without customer approval in accordance with 47 C.F.R. § 64.2005. Accordingly, the Company currently does not use CPNI in a manner that requires customer approval and is not required to implement a system by which the status of a customer's CPNI approval can be established prior to the use of CPNI. Therefore, as permitted by the CPNI rules, the Company may use CPNI (1) to initiate, render, bill, and collect for telecommunications services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use; (3) to provide any inbound telemarketing or administrative services for the duration of a call; (4) to provide customer premises equipment and protocol conversion; and (5) to provision inside wiring, maintenance and repair services.

In the event the Company changes its marketing efforts in a way that requires the approval of customers before using CPNI, the Company will implement policies and procedures and train employees to ensure compliance with all relevant FCC rules, including opt-in or opt-out authorizations.

The Company does not share, sell, lease and otherwise provide CPNI to any unrelated third parties for the purposes of marketing any services. Sharing, selling, leasing or otherwise providing CPNI to any unrelated third parties is strictly prohibited by the Company.

The Company has implemented processes and procedures to train its personnel as to when they are and are not permitted to use CPNI. For instance, all Company employees are required to abide by the Company's Code of Conduct, which requires employees to maintain the confidentiality of all information that is obtained as result of their employment by the Company. Furthermore, employees are required to execute a Confidentiality Agreement which requires employees to maintain the confidentiality of all information obtained through their employment with the Company. Employees who violate the Company's Code of Conduct or Confidentiality Agreement will be subject to discipline, including possible termination.

Although the Company has never received any complaint from a customer that it has misused CPNI in any fashion, in an abundance of caution and in light of the recent reports about the availability on the Internet of sensitive, personal subscriber information to third parties, the Company currently is auditing all of its training and discipline policies and procedures relating to the use of CPNI by Company employees. In the event the Company determines that Company employees require more training in order to protect CPNI, the Company will update its training processes and other procedures as necessary.

The Company has not engaged in any sales and marketing campaigns that use CPNI during this reporting period. In the event the Company does engage in such sales and marketing campaigns, it will maintain a record of such contacts through its account management databases

for at least one year. The Company has not engaged in any “outbound marketing situations” (as described in 47 C.F.R. § 69.20009(d) during this reporting period. In the event the Company conducts any outbound marketing, appropriate Company personnel will review and supervise such activities and maintain appropriate records for a period of at least one year.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. O'Krent', with a large, stylized loop at the end.

Marc O’Krent, President, The Telephone  
Connection of Los Angeles, Inc.  
Manager, The Telephone Connection Service, LLC  
and The Telephone Connection IXC Services, LLC

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